

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA <i>ex rel.</i>	)	
ALEX DOE, Relator, <i>et al.</i> ,	)	
	)	Civil Action No. 2:21-22
Plaintiffs	)	
	)	
v.	)	
	)	
PLANNED PARENTHOOD FEDERATION	)	
OF AMERICA, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**THIRD DECLARATION OF ATTORNEY JOSEPH ST. JOHN**

I serve as a Deputy Solicitor General in the Louisiana Department of Justice. I am counsel for non-parties Louisiana Department of Health, Stephen Russo (in his official capacity), and Kimberly Sullivan (in her official capacity) in connection with the above-captioned litigation. I have personal knowledge of the facts stated herein.

1. I am informed and believed that LDH attorneys Stephen Russo and Kimberly Sullivan participated in and/or oversaw litigation-related communications with Planned Parenthood, including regarding this case.

2. The communications resulted in a written agreement executed by Planned Parenthood attorney Carrie Flaxman and LDH attorney Stephen Russo.

3. Paragraph 8 of that agreement states, in relevant part:

The Parties agree that this Settlement Agreement does not resolve and shall have no effect on any and all claims, causes of action, and/or allegations which have or may be brought, filed and/or investigated by ... any relator, or agencies of the United States government .... The Parties specifically acknowledge that this Settlement Agreement does not resolve and shall have no effect on *U.S. ex rel Doe et al v. Planned Parenthood Federation of America, et al.*, United States District Court for the Northern District of Texas, docket number 2:21-cv-22.

4. That agreement includes numerous markings as follows:

SETTLEMENT AND COMPROMISE  
SUBJECT TO FED. R. EVID. 408 / LA. CODE EVID. 408

5. I am further informed and believe that at least some of the communications leading up to that agreement took place via email.

6. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT to the best of my knowledge.

Executed in New Orleans, Louisiana, this 5th day of December 2022.

/s/ Joseph S. St. John

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JOSEPH S. ST. JOHN